

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

|                                   |   |                               |
|-----------------------------------|---|-------------------------------|
| <b>In re:</b>                     | ) |                               |
|                                   | ) |                               |
| <b>KEITH LINDSEY HARVILLE and</b> | ) | <b>Case No. 3:15-bk-05315</b> |
| <b>GUADALUPE PINEDA HARVILLE,</b> | ) | <b>Chapter 7</b>              |
|                                   | ) | <b>Judge Harrison</b>         |
| <b>Debtors.</b>                   | ) |                               |

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**THE DEADLINE FOR FILING A TIMELY RESPONSE IS: November 19, 2015**  
**IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: December 8, 2015, at**  
**9:00 a.m., in Courtroom Three, 2<sup>nd</sup> Floor, Customs House, 701 Broadway, Nashville,**  
**Tennessee.**

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**NOTICE OF MOTION FOR EXTENSION OF TIME TO FILE COMPLAINT  
OBJECTING TO DISCHARGE AND/OR SEEKING NON-DISCHARGEABILITY**

Arkansas Family Care Network, P.A. ("AFCN"), a creditor herein, has asked the court for the following relief: extension of time to file complaint objecting to discharge and/or seeking non-dischargeability of its debt.

**YOUR RIGHTS MAY BE AFFECTED.** If you do not want the court to grant the attached motion by entering the attached order, or if you want the court to consider your views on the motion, then on or before November 19 2015, you or your attorney must:

1. File with the court your response or objection explaining your position. **PLEASE NOTE: THE BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE REQUIRES ELECTRONIC FILING. ANY RESPONSE OR OBJECTION YOU WISH TO FILE MUST BE SUBMITTED ELECTRONICALLY. TO FILE ELECTRONICALLY, YOU OR YOUR ATTORNEY MUST GO TO THE COURT WEBSITE AND FOLLOW THE INSTRUCTIONS AT: <<https://ecf.tnmb.uscourts.gov>>.**

If you need assistance with Electronic Filing you may call the Bankruptcy Court at (615) 736-5584. You may also visit the Bankruptcy Court in person at: 701 Broadway, 1st Floor, Nashville, TN (Monday - Friday, 8:00 A.M. - 4:00 P.M.).

2. **Your response must state that the deadline for filing responses is November 19, 2015, the date of the scheduled hearing is December 8, 2015, and the motion to which you are responding is the Motion for Extension of Time to File Complaint Objecting to Discharge and/or Seeking Non-Dischargeability.**

3. You must serve your response or objection **by electronic service through the Electronic Filing system** described above. You must also mail a copy of your response or objection to:

|                         |                                       |                              |
|-------------------------|---------------------------------------|------------------------------|
| Michael Gigandet        | United States Trustee                 | Phillip G. Young, Jr.        |
| 208 Centre St.          | 701 Broadway, Customs House Suite 318 | Thompson Burton PLLC         |
| Pleasant View, TN 37146 | Nashville, TN 37203                   | 6100 Tower Circle, Suite 200 |
|                         |                                       | Franklin, TN 37067           |

If a response is filed before the deadline stated above, the hearing will be held at the time and place indicated above. ***THERE WILL BE NO FURTHER NOTICE OF THE HEARING DATE.*** You may check whether a timely response has been filed by calling the Clerk's office at (615) 736-5584 or viewing the case on the Court's website at <<https://ecf.tnmb.uscourts.gov>>.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter the attached order granting that relief.

Dated: October 29, 2015

By: /s/ Phillip G. Young, Jr.  
Phillip G. Young, Jr.  
Thompson Burton PLLC  
6100 Tower Circle, Suite 200  
Franklin, Tennessee 37067  
Tel: 615-465-6008  
[phillip@thompsonburton.com](mailto:phillip@thompsonburton.com)

Attorneys for AFCN

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

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|-----------------------------------|---|-------------------------------|
| <b>In re:</b>                     | ) |                               |
|                                   | ) |                               |
| <b>KEITH LINDSEY HARVILLE and</b> | ) | <b>Case No. 3:15-bk-05315</b> |
| <b>GUADALUPE PINEDA HARVILLE,</b> | ) | <b>Chapter 7</b>              |
|                                   | ) | <b>Judge Harrison</b>         |
| <b>Debtors.</b>                   | ) |                               |

**MOTION FOR EXTENSION OF TIME TO FILE COMPLAINT  
OBJECTING TO DISCHARGE AND/OR SEEKING NON-DISCHARGEABILITY**

Arkansas Family Care Network, P.A. (“AFCN”), a creditor herein, moves this Court for an extension of the deadline to object to the Debtors’ discharge and/or seeking non-dischargeability of a debt to AFCN. AFCN seeks an extension of the objection deadline until January 9, 2016 (which is the date through which the Chapter 7 Trustee has received an extension).

In the last few weeks, AFCN has discovered some evidence of possible assets that may not have been disclosed in the Debtors’ statements and schedules. AFCN has only this week engaged undersigned counsel to investigate those matters further to determine whether there are grounds to object to the Debtors’ discharge and/or dischargeability.

Accordingly, AFCN requests that the deadline for objection to the Debtors’ discharge and/or the deadline for filing a non-dischargeability complaint be extended to and including January 9, 2016.

Respectfully submitted,

/s/ Phillip G. Young, Jr.  
Phillip G. Young, Jr.  
Thompson Burton PLLC  
6100 Tower Circle, Suite 200  
Franklin, Tennessee 37067  
Tel: 615-465-6008  
phillip@thompsonburton.com

Attorneys for AFCN

# PROPOSED

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**In re:**

**KEITH LINDSEY HARVILLE and  
GUADALUPE PINEDA HARVILLE,**

**Debtors.**

)  
)  
)  
)  
)  
)

**Case No. 3:15-bk-05315  
Chapter 7  
Judge Harrison**

**ORDER GRANTING EXTENSION OF DEADLINE  
FOR FILING COMPLAINT OBJECTING TO DISCHARGE  
AND/OR SEEKING NON-DISCHARGEABILITY**

For the reasons set forth in the motion filed by Arkansas Family Care Network, P.A. (“AFCN”), and it appearing that good causes exists for the extension of the deadline for AFCN to file an objection to the Debtors’ discharge and/or to file a complaint for non-dischargeability. It is therefore, ORDERED that the deadline for filing an objection to the Debtors’ discharge and/or to the non-dischargeability of AFCN’s debt shall be extended to and including January 9, 2016.

**This Order was signed and entered electronically as indicated at the top of the first page.**

**APPROVED FOR ENTRY:**

/s/ Phillip G. Young, Jr.  
Phillip G. Young, Jr.  
Thompson Burton PLLC  
6100 Tower Circle, Suite 200  
Franklin, Tennessee 37067  
Tel: 615-465-6008  
phillip@thompsonburton.com

Attorneys for AFCN

**Certificate of Service**

The undersigned hereby certifies that a copy of the preceding Motion was electronically filed and served via the Court's ECF system this 29th day of October, 2015:

/s/ Phillip G. Young, Jr.  
Phillip G. Young, Jr.  
Thompson Burton PLLC  
6100 Tower Circle, Suite 200  
Franklin, Tennessee 37067  
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Attorneys for Trustee